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*Kelsy Arlitz and Gary Arlitz and Karie Arlitz
as General Guardians of Kelsy Arlitz*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KELSY ARLITZ, individually; GARY ARLITZ, as general guardian of ward KELSY ARLITZ; KARIE ARLITZ, as general guardian of ward KELSY ARLITZ.

Plaintiffs.

vs.

GEICO CASUALTY COMPANY; DOES 1 through 100 and ROE CORPORATIONS 1 through 100, inclusive.

Defendants.

Case No.: 2:19-cv-00743-RFB-DJA

STIPULATION AND
[PROPOSED] ORDER TO
EXTEND DEADLINE FOR
PLAINTIFFS TO FILE THEIR
RESPONSE TO DEFENDANT
GEICO CASUALTY COMPANY'S
MOTION FOR SUMMARY
JUDGMENT ON COVERAGE
AND DUTY TO DEFEND (ECF
NO. 50) AND TO EXTEND
DEADLINE FOR PLAINTIFFS
TO FILE THEIR RESPONSE TO
DEFENDANT'S MOTION TO
STAY DISCOVERY (ECF NO. 54)

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs KELSY ARLITZ, individually; GARY ARLITZ, as general guardian of ward KELSY ARLITZ,



1 and KARIE ARLITZ, as general guardian of ward KELSY ARLITZ, through their
 2 counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and
 3 Defendant GEICO CASUALTY COMPANY, through its counsel of record, Wade M.
 4 Hansard and Jonathan W. Carlson of McCORMICK, BARSTOW, SHEPPARD, WAYTE
 5 & CARRUTH LLP, that the deadline for Plaintiffs to file their Response to Defendant
 6 GEICO Casualty Company's Motion for Summary Judgment on Coverage and Duty to
 7 Defend (ECF No. 50) shall be extended from September 9, 2020 to September 18, 2020.
 8 The Motion was filed on August 19, 2020. This is the first request for extension of time
 9 for Plaintiffs to file their Response to the Motion.

10 IT IS FURTHER STIPULATED AND AGREED that the deadline for Plaintiffs to
 11 file their Response to Defendant GEICO Casualty Company's Motion to Stay Discovery
 12 (ECF No. 54) shall be extended from September 8, 2020 to September 18, 2020. The
 13 Motion was filed on August 24, 2020. This is the first request for extension of time for
 14 Plaintiffs to file their Response to the Motion. This Stipulation and [Proposed] Order is
 15 submitted in accordance with LR IA 6-1.

16 The purpose for the parties' request is that Plaintiffs' undersigned counsel has
 17 been away from the office over the course of the last several weeks to address several
 18 personal issues that have arisen from the listing and sale of his home. The parties
 19 continue to address a separate issue regarding the depositions of GEICO's claims
 20 personnel and whether such depositions shall proceed later this month, which has also
 21 taken substantial time and effort. Given that GEICO's summary judgment motion is 30
 22 pages long and seeks case-concluding relief, additional time is needed for Plaintiffs to
 23 fully address and respond to all of GEICO's arguments set forth in the motion. The
 24 motion to stay discovery is also interrelated to the summary judgment motion, and an
 25 extension of time will allow Plaintiffs to fully address those issues as well. The brief
 26 extension of time requested will ensure that all issues presented to this Court are fully
 27 addressed, which will ultimately aid this Court in its decision.

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1 Accordingly, the parties respectfully request this Court to approve the foregoing
2 stipulation. Their requested extension is not made in bad faith or to unnecessarily delay
3 these proceedings.

4 DATED this 8th day of September, 2020.

DATED this 8th day of September, 2020

5 **PRINCE LAW GROUP**

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McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
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/s/ *Kevin T. Strong*

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ORDER

IT IS SO ORDERED.

DATED this 11th day of September, 2020.


RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE